

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

ULVIO ELIECER VILLACIS TONATO, MANUEL CLAUDIO
MEJIA CAIZAGUANO, LUIS EDUARDO IXCAYA POS, JORGE
JAVIER RAMON MAISANCHEZ, CESAR ANIBAL MACAS
LASLUIA, BRYAN LEONARDO MACAS CUNALATA,
individually and on behalf of all others similarly situated,

Plaintiff(s)

v.

TITAN REALTY & CONSTRUCTION LLC, LUMICA
STONE AND TILE CORP. and K & V STONE
CORP., KEITH ZENOBIO and KONRAD EDUARDO
FLORES, as individuals,

Defendant(s)

Civil Action No. 25-cv-2858

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* See attached Rider.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Helen F. Dalton & Associates, P.C.

Roman Avshalumov, Esq.

80-02 Kew Gardens Road, Suite 601

Kew Gardens, NY 11415

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.



BRENNNA B. MAHONEY
CLERK OF COURT

Cynthia Valera

Signature of Clerk or Deputy Clerk

Date: 05/22/2025

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

RIDER TO SUMMONS

Civil Case No.: _____

FULL COMPLAINT CAPTION:

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ULVIO ELIECER VILLACIS TONATO, MANUEL
CLAUDIO MEJIA CAIZAGUANO, LUIS EDUARDO
IXCAYA POS, JORGE JAVIER RAMON MAISANCHEZ,
CESAR ANIBAL MACAS LASLUISA, BRYAN
LEONARDO MACAS CUNALATA, individually and on
behalf of all others similarly situated,

Plaintiffs,

-against-

TITAN REALTY & CONSTRUCTION LLC, LUMICA
STONE AND TILE CORP. and K & V STONE CORP.,
KEITH ZENOBIO and KONRAD EDUARDO FLORES, as
individuals,

Defendants.

-----X

via Personal Service:

TITAN REALTY & CONSTRUCTION LLC

One Plaza Road, Suite LL1, Greenvale, NY 11548

LUMICA STONE AND TILE CORP.

47-00 48th Street, Woodside, NY 11377

K & V STONE CORP.

47-00 48th Street, Woodside, NY 11377

KEITH ZENOBIO

One Plaza Road, Suite LL1, Greenvale, NY 11548

KONRAD EDUARDO FLORES

47-00 48th Street, Woodside, NY 11377

Service via Secretary of State:

TITAN REALTY & CONSTRUCTION LLC (DOS ID: 3318479)

One Plaza Road, Suite LL1, Greenvale, NY 11548

LUMICA STONE AND TILE CORP. (DOS ID: 6669764)

1917 Parsons Blvd., Whitestone, NY 11357

K & V STONE CORP. (DOS ID: 3997471)

58-17 Fresh Pond Road, Apartment 2-RE, Maspeth, NY 11378

Civil Case No.:

**COLLECTIVE ACTION
COMPLAINT**

*JURY TRIAL
DEMANDED*